NOV 30 1989

In Reply Refer To:
Docket: 50-458/89-24

Gulf States Utilities
ATTN: James C. Deddens
Senior Vice President (RBNG)
P.O. Box 220
St. Francisville, Louisiana 70775

Gentlemen:

Thank you for your letters of July 31, October 17, and November 7, 1989, in response to our letter and Notice of Violation dated June 30, 1989. We have reviewed your replies and find them responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

/S/

Samuel J. Collins, Director
Division of Reactor Projects

cc:
Gulf States Utilities Company
ATTN: J. E. Booker, Manager-
River Bend Oversight
P.O. Box 2951
Beaumont, TX 77704

Conner and Wetterhahn
ATTN: Troy B. Conner, Jr., Esq.
1747 Pennsylvania Avenue, NW
Washington, D.C. 20006

Gulf States Utilities Company
ATTN: Les England, Director
Nuclear Licensing
P.O. Box 220
St. Francisville, LA 70775

| | | |
|---|---|---|
| RIV:DRP/C | C:DRP/C | D:DRP |
| GLMadsen:df | GLConstable | SJCollins |
| 11/30/89 | 11/30/89 | 11/30/89 |

IE01

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ATTN: Philip G. Harris
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Department of Environmental Quality
ATTN: William H. Spell, Administrator
Nuclear Energy Division
P.O. Box 14690
Baton Rouge, Louisiana 70898

U.S. Nuclear Regulatory Commission
ATTN: Resident Inspector
P. O. Box 1051
St. Francisville, Louisiana 70775

U.S. Nuclear Regulatory Commission
ATTN: Regional Administrator, Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

bcc to DMB (IE01)

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DRSS-FRPS
Project Engineer (DRP/C)
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Resident Inspector
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GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 220 ST FRANCISVILLE LOUISIANA 70775

AREA CODE 504 635-6094 348-6651

November 7, 1989
RBG- 31731
File Nos. G9.5, G15.4.1



U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1
Refer to: Region IV
Docket No. 50-458/Report 89-24

Gulf States Utilities Company (GSU) is providing our corrected supplemental response to Notice of Violation 8924-01, "Failure to Provide Adequate Procedures for Control of a Special Process," as discussed with Messrs. W. Paulson, D. Nottley and G. Constable of your staff on August 24 and September 12, 1989. This supplement provides grammatical corrections to the supplement dated October 17, 1989. These changes were discussed with your Messrs. W. A. Paulson and G. L. Constable on October 31, 1989.

Should you have any questions, please contact Mr. L. A. England at (504) 381-4145.

Sincerely,

J. E. Booker

J. E. Booker
Manager-River Bend Oversight
River Bend Nuclear Group

JEB/LAE/MSF/CMC/ch

Attachments

cc: U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

NRC Senior Resident Inspector
P. O. Box 1051
St. Francisville, LA 70775

8911170074 [illegible]

IC-89-679

**ATTACHMENT**

**Response to Notice of Violation 50-458/8924-01**

**Level IV**

REFERENCES:

Notice of Violation - Letter from J. L. Milhoan to J. C. Deddens, dated June 30, 1989.

Licensee Event Report 89-020 from J. E. Booker to Document Control Desk, dated May 19, 1989.

Augmented Inspection Team - Inspection Report No. 50-458/89-20 from L. J. Callan to J. C. Deddens, dated May 16, 1989.

FAILURE TO PROVIDE ADEQUATE PROCEDURES FOR CONTROL OF A SPECIAL PROCESS:

River Bend Station Technical Specification 6.8.1.a requires that procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, Paragraph 9, requires that maintenance activities that can affect the performance of safety- related equipment and that require skills not normally possessed by qualified maintenance personnel be properly preplanned and performed in accordance with detailed procedures.

Contrary to the above, Corrective Maintenance Procedure (CMP)-9186, Revision 4, "Freeze Seal," did not require the use of a temperature detecting device in the sleeve of the freeze seal chamber to monitor the freeze plug integrity and the procedure did not prohibit supplying more than one freeze plug from the same nitrogen bottle. These procedural inadequacies contributed to the loss of freeze seal event on a 6-inch service water line on April 19, 1989.

REASON FOR THE VIOLATION:

Gulf States Utilities Company (GSU) has reviewed Inspection Report No. 50-458/89-20 concerning the NRC Augmented Inspection conducted April 21-24, 1989, and has found the facts contained therein to be factual and accurate. Licensee Event Report (LER) 89-020 was submitted May 19, 1989 and discussed this event as well. GSU believes that there were several contributing factors which led to the occurrence of this event:

1. An insufficient supply of liquid nitrogen coolant to the freeze plug resulted in a failure of the freeze plug.

2. Both freeze plugs were fed from the same nitrogen supply line. This system did not provide for independent control of liquid nitrogen flow to each of the two plugs.

3. Corrective Maintenance Procedure (CMP)-9186, Rev. 4 was ambiguous with respect to the temperature monitoring requirements for freeze plugs. Also, this procedure did not prohibit the use of an adequate coolant supply to feed multiple freeze plugs.

4. Inadequate freeze plug monitoring resulted in the failure of the personnel involved to detect the onset and continuation of thawing of the freeze plug. The lack of freeze plug temperature monitoring was the major weakness identified.

5. Maintenance personnel had limited experience applying freeze plugs and a lack of formal training on freeze plugs may also be contributory factors to the incident.

6. Operators lacked pertinent information as to the exact location of the freeze plug activity in progress and the lack of contingency plans to mitigate consequences of freeze plug failure hampered the control room's ability to respond to the failure. However, given the circumstances surrounding the incident, plant personnel responded commendably.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

Immediate corrective actions taken included: operations personnel secured the Division II standby service water system to isolate the leak; reactor protection system power was transferred to its alternate power supply; the shutdown cooling mode of the residual heat removal system was restored within approximately 17 minutes with an insignificant increase in reactor coolant temperature; and, GSU management dictated that freeze plugging activities would no longer be performed by GSU personnel.

The standby service water supply and return isolation valves (1SWP*VF0524 and 1SWP*VF0525) for unit cooler 1HVR*UC11B were successfully repaired under a revised maintenance work order (MWO) using another pair of freeze plugs installed and maintained by a contractor (Freeze Technologies, Inc.) specializing in this service. Freeze Technologies, Inc. performed subsequent freeze seals during the second refueling outage.

The Equipment Qualification and Specification Group of Design Engineering performed a walkdown of the affected areas of the auxiliary building to identify those equipment items susceptible to moisture ingress. All Class 1E switchgear inspected was dry internally, and there were no water lines noted on the structures. MWOs were written to perform internal inspections of the equipment in other areas where it was suspected that moisture ingress was possible. The devices located within the equipment was cleaned, dried, and returned to its qualified condition where moisture was found internally. The documentation action of this inspection is contained in Equipment Qualification Impact Summary (EQIS) No. X-388.

Corrective Maintenance Procedure (CMP)-9186, "Freeze Seal," was revised on May 3, 1989 via Temporary Change Notice (TCN) 89-0462 to emphasize the requirement of temperature monitoring during freeze plugging. This TCN also prohibited the setting of multiple freeze plugs using an inadequate coolant supply.

An existing Engineering Evaluation and Assistance Request (EEAR) 86-R0093 for water proofing of all non-safety related switchgear equipment in the auxiliary building was dispositioned to initiate Modification Request (MR) 89-0135 to address the floor electrical penetrations in motor control centers, 1EHS*MCC2J and 1EHS*MCC2L and to prevent future electrical failures of Auxiliary Building 13.8KV switchgear due to flooding.

The Independent Safety Engineering Group (ISEG) prepared Operating Experience Report (OER) 89-008, dated June 13, 1989. This report reviewed the freeze plug failure event and the corrective actions taken. Based on those corrective actions taken, no additional ISEG recommendations were made.

Quality Assurance performed six surveillances as a result of this event:

1. OS-89-04-49, "Conduct of Operations After Freeze Seal Transient",

2. OS-89-04-48, "Loss of Freeze Plug Incident",

3. OS-89-05-35, "Follow-up on OS-89-04-48"

4. OS-89-05-18, "Freeze Seal", and

5. OS-89-04-61, "Unscheduled Surveillance on Freeze Technology International, Inc."

6. ES-89-04-64, "Moisture Intrusion in Electrical Equipment" recommended EEAR 86-R0093 be completed. The EEAR is finalized and MR 89-0135 has been initiated.

Condition Reports (CR) 89-0492 and 89-0493 were issued to document the recommendations of these surveillances. CR 89-0492 describes the procedural deficiencies and CR 89-0493 discusses the training deficiencies previously identified.

Gulf States Utilities has reviewed the effects of discharging the fire water spray system on the 141' elevation of the auxiliary building. This study considered the effect of ponding water on the protected elevation as well as all elevations below. Also included was the effect of water, in the form of sprinkler discharge or floor runoff, on safe shutdown equipment. The basis for this investigation was the original design criteria established for the fire hazards analysis (FHA) and the moderate energy line crack (MELC) analysis.

Neither analysis took credit for the floor drain system, assuming water discharging underneath stairwell doors and down the elevator shaft. The latest study showed that the depth of water on the 141' elevation due to fire water flow is less than 0.75". Therefore, no safe shutdown equipment is affected by flooding due to fire water discharge since all safety-related equipment is elevated at least 1.375".

Water spray effects on the safe shutdown equipment were also reviewed, using the MELC guidance. Two potential targets were identified on the fringe of the sprinkled area, panel 1SCV*PNL2C1 and transformer 1SCV*XD2C. The MELC analysis required the conduit entering this equipment to be sealed for water

entry and notes shielding is provided by adjacent equipment. Due to the small amount of spray, protected conduit entry and shielding, this equipment will not be damaged by sprinkler discharge. Below the 141' elevation, water depths are bounded by the MELC analysis, due to the much larger flows typically found. Therefore, no safe shutdown equipment is affected by either fire water discharge spray or fire water sprinkler runoff to a lower elevation.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

Freeze plug training requirements were added to Maintenance Section Procedure (MSP)-0009, "Qualification of Maintenance Personnel," requiring maintenance personnel to be trained in freeze plug installation techniques in order to install freeze plugs at River Bend Station (RBS).

CMP-9186 has been formally cancelled ensuring that RBS personnel will not perform freeze sealing until a proper procedure is developed and training completed.

The Operations Department issued Standing Order #76 on April 23, 1989, which requires contingency plans to be provided to the main control room for all future freeze plugs. These contingency plans include pertinent details about the freeze plugs and the actions to be taken to mitigate the consequences of the failure.

Electrical floor penetrations in motor control centers 1EHS*MCC2J and 1EHS*MCC2L will be sealed in accordance with MR 89-0135 to prevent future electrical failures of Auxiliary Building 13.8KV switchgear due to flooding.

When GSU implements its freeze plugging program, the procedures and trainin g will address the necessity of a sufficient supply of nitrogen, the independence of the nitrogen supplies for multiple plugs, and the necessity for equipment and personnel monitoring during maintenance and installation of the plug.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

GSU will perform training to maintenance personnel required to install and maintain freeze plugs prior to GSU performing any freeze plug activities in the future.

MR 89-0135 will be completed prior to the end of the third refueling outage, scheduled to begin September 15, 1990.

# GULF STATES UTILITIES COMPANY

July 31, 1989
RBG- 31314
File Nos. G9.5, G15.4.1



U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1
Refer to: Region IV
Docket No. 50-458/Report 89-24

Pursuant to 10CFR2.201, Gulf States Utilities Company (GSU) is providing our responses to the two Notices of Violation identified by your Messrs. E. J. Ford and W. B. Jones in NRC Inspection Report 89-24.

Attachment 1 provides GSU's response to Violation 8924-01, "Failure to Provide Adequate Procedures for Control of a Special Process," and Attachment 2 provides GSU's response to Violation 8924-02, "Failure to Provide Adequate Training for Control of a Special Process". Should you have any questions, please contact Mr. L. A. England at (504) 381-4145.

Sincerely,

J. E. Booker
Manager-River Bend Oversight
River Bend Nuclear Group

JEB/LAE/EMC/RJK/MSF/ch
RJK MSF

Attachments

cc: U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

NRC Senior Resident Inspector
P. O. Box 1051
St. Francisville, LA 70775

IC-89-278

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA )
PARISH OF WEST FELICIANA )
In the Matter of ) Docket No. 50-458
GULF STATES UTILITIES COMPANY )
(River Bend Station - Unit 1)

**AFFIDAVIT**

J. E. Booker, being duly sworn, states that he is Manager-River Bend Oversight for Gulf States Utilities Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the documents attached hereto; that he has read all of the statements contained in such documents attached thereto and made a part thereof; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information and belief.

J. E. Booker

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 31st day of July, 1989. My Commission expires with Life.

Claudia F. Hurst
Notary Public in and for
West Feliciana Parish, Louisiana

**ATTACHMENT 1**

**Response to Notice of Violation 50-458/8924-01**

**Level IV**

REFERENCES:

Notice of Violation - Letter from J. L. Milhoan to J. C. Deddens, dated June 30, 1989.

Licensee Event Report 89-020 from J. E. Booker to Document Control Desk, dated May 19, 1989.

Augmented Inspection Team - Inspection Report No. 50-458/89-20 from L. J. Callan to J. C. Deddens, dated May 16, 1989.

FAILURE TO PROVIDE ADEQUATE PROCEDURES FOR CONTROL OF A SPECIAL PROCESS:

River Bend Station Technical Specification 6.8.1.a requires that procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, Paragraph 9, requires that maintenance activities that can affect the performance of safety-related equipment and that require skills not normally possessed by qualified maintenance personnel be properly preplanned and performed in accordance with detailed procedures.

Contrary to the above, Corrective Maintenance Procedure (CMP)-9186, Revision 4, "Freeze Seal," did not require the use of a temperature detecting device in the sleeve of the freeze seal chamber to monitor the freeze plug integrity and the procedure did not prohibit supplying more than one freeze plug from the same nitrogen bottle. These procedural inadequacies contributed to the loss of freeze seal event on a 6-inch service water line on April 19, 1989.

REASON FOR THE VIOLATION:

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2. Both freeze plugs were fed from the same nitrogen supply line. This system did not provide for independent control of liquid nitrogen flow to each of the two plugs.

3. Corrective Maintenance Procedure (CMP)-9186, Rev. 4 was ambiguous with respect to the temperature monitoring requirements for freeze plugs. Also, this procedure did not prohibit the use of an adequate coolant supply to feed multiple freeze plugs.

4. Inadequate freeze plug monitoring resulted in the failure of the personnel involved to detect the onset and continuation of thawing of the freeze plug. The lack of freeze plug temperature monitoring was the major weakness identified.

5. Maintenance personnel had limited experience applying freeze plugs and a lack of formal training on freeze plugs may also be contributory factors to the incident.

6. Operators lacked pertinent information as to the exact location of the freeze plug activity in progress and the lack of contingency plans to mitigate consequences of freeze plug failure hampered the control room's ability to respond to the failure. However, given the circumstances surrounding the incident, plant personnel responded commendably.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

Immediate corrective actions taken included: operations personnel secured the Division II standby service water system to isolate the leak, reactor protection system power was transferred to its alternate power supply, the shutdown cooling mode of the residual heat removal system was restored within approximately 17 minutes with an insignificant increase in reactor coolant temperature, and GSU management dictated that freeze plugging activities would no longer be performed by GSU personnel.

The standby service water supply and return isolation valves (1SWP*VF0524 and 1SWP*VF0525) for unit cooler 1HVR*UC11B were successfully repaired under a revised maintenance work order (MWO) using another pair of freeze plugs installed and maintained by a contractor (Freeze Technologies, Inc.) specializing in this service. Freeze Technologies, Inc. performed subsequent freeze seals during the second refueling outage.

The Equipment Qualification and Specification Group of Design Engineering performed a walkdown of the affected areas of the auxiliary building to identify those equipment items susceptible to moisture ingress. All Class 1E switchgear inspected was dry internally, and there were no water lines noted on the structures. MWOs were written to perform internal inspections of the equipment in other areas where it was suspected that moisture ingress was possible. The devices located within the equipment were cleaned, dried, and returned to its qualified condition where moisture was found internally. The documentation of this inspection is contained in Equipment Qualification Impact Summary (EQIS) No. X-388.

Corrective Maintenance Procedure (CMP)-9186, "Freeze Seal," was revised on May 3, 1989 via Temporary Change Notice (TCN) 89-0462 to emphasize the requirement of temperature monitoring during freeze plugging. This TCN also prohibited the setting of multiple freeze plugs using an inadequate coolant supply.

An existing Engineering Evaluation and Assistance Request (EEAR) 86-R0093 for water proofing of all non-safety related switchgear equipment in the auxiliary building was dispositioned to initiate Modification Request (MR) 89-0135 to address the floor electrical penetrations in motor control centers, 1EHS*MCC2J and 1EHS*MCC2L and to prevent future electrical failures of Auxiliary Building 13.8KV switchgear due to flooding.

The Independent Safety Engineering Group (ISEG) prepared Operating Experience Report (OER) 89-008, dated June 13, 1989. This report reviewed the freeze plug failure event and the corrective actions taken. Based on those corrective actions taken, no additional ISEG recommendations were made.

Quality Assurance performed six surveillances as a result of this event:

1. OS-89-04-49, "Conduct of Operations After Freeze Seal Transient",

2. OS-89-04-48, "Loss of Freeze Plug Incident",

3. OS-89-05-35, "Follow-up on OS-89-04-48"

4. OS-89-05-18, "Freeze Seal", and

5. OS-89-04-61, "Unscheduled Surveillance on Freeze Technology International, Inc."

6. ES-89-04-64, "Moisture Intrusion in Electrical Equipment" recommended EEAR 86-R0093 be completed. The EEAR is finalized and MR 89-0135 has been initiated.

Condition Reports (CR) 89-0492 and 89-0493 were issued to document the recommendations of these surveillances. CR 89-0492 describes the procedural deficiencies and CR 89-0493 discusses the training deficiencies previously identified.

Design Engineering completed EEAR 89-R0141 concerning the adequacy of the auxiliary building floor drain system to accomodate flooding conditions. The EEAR documented GSU's conclusion that the drains are designed for safe plant shutdown in the event of a moderate energy line crack. The RBS original design for the floor drainage system was not required to mitigate the consequences of a flooding event similar to a freeze plug failure.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

Freeze plug training requirements were added to Maintenance Section Procedure (MSP)-0009, "Qualification of Maintenance Personnel," requiring maintenance personnel to be trained in freeze plug installation techniques in order to install freeze plugs at River Bend Station (RBS).

CMP-9186 has been formally cancelled ensuring that RBS personnel will not perform freeze sealing until a proper procedure is developed and training completed.

The Operations Department issued Standing Order #76 on April 23, 1989, which requires contingency plans to be provided to the main control room for all

future freeze plugs. These contingency plans include pertinent details about the freeze plugs and the actions to be taken to mitigate the consequences of the failure.

Electrical floor penetrations in motor control centers 1EHS*MCC2J and 1EHS*MCC2L will be sealed in accordance with MR 89-0135 to prevent future electrical failures of Auxiliary Building 13.8KV switchgear due to flooding.

When GSU implements its freeze plugging program, the procedures and training will address the necessity of a sufficient supply of nitrogen, the independence of the nitrogen supplies for multiple plugs and the necessity for equipment and personnel monitoring during maintenance and installation of the plug.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

GSU will provide training to maintenance personnel required to install and maintain freeze plugs prior to GSU performing any freeze plug activities in the future.

MR 89-0135 will be completed prior to the end of the third refueling outage, scheduled to begin September 15, 1990.

ATTACHMENT 2

Response to Notice of Violation 50-458/8924-02

Level IV

REFERENCES:

Notice of Violation - Letter from L. J. Callan to J. C. Deddens, dated June 30, 1989

Licensee Event Report 89-020 from J. E. Booker to Document Control Desk, dated May 19, 1989.

Augmented Inspection Team - Inspection Report No. 50-458/89-20 from L. J. Callan to J. C. Deddens, dated May 16, 1989.

FAILURE TO PROVIDE ADEQUATE TRAINING TO CONTROL A SPECIAL PROCESS:

10CFR50, Appendix B, Criterion IV, "Control of Special Process," requires, in part, that measures be established to ensure that special processes are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements.

The licensee's Quality Assurance Directive (QAD)-9, "Control of Special Processes," Revision 4, paragraph 4.4, requires that special processes be performed by personnel, equipment, and procedures that have been qualified and certified in accordance with applicable codes, standards, specifications, approved QA programs, or other special requirements.

Contrary to the above, the individuals performing the freeze seal on April 19, 1989, to isolate Service Water Valves 1SWP*524 and 1SWP*525, had not been certified to perform the activity through any special requirement other than observation of previous freeze seal activities.

REASON FOR VIOLATION:

The reason for this violation is discussed in Attachment 1 of this letter, "Response to Notice of Violation 8924-01."

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

The corrective actions noted in Attachment 1 of this letter are sufficient to address the concerns here. To reiterate, freeze plug training requirements have been added to MSP-0009, "Qualification of Maintenance Personnel."

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

Maintenance personnel will not install freeze plugs at River Bend Station until they have been adequately trained on freeze plug installation and maintenance. CMP-9186 has been cancelled until a proper procedure has been developed and adequate training has been completed.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

In accordance with Attachment 1 of this letter, GSU will train maintenance personnel required to perform freeze plugs prior to GSU performing any freeze plug activities in the future.